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October 29, 2001

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: Service Quality Plan for Fall River Gas Company and North Attleboro Gas Company, New England Division of Southern Union Company, Pursuant to D.T.E. 00-25 and D.T.E. 00-26.

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Dear Secretary Cottrell:

In accordance with the directives of the Department of Telecommunications and Energy (the "Department") in the above-referenced proceedings, Fall River Gas Company ("Fall River") and North Attleboro Gas Company ("North Attleboro") (together, the "Companies"), each of the New England Division of Southern Union Company ("Southern Union"), hereby file service-quality plans, which were developed based on the standards developed by the Department in Service Quality Standards, D.T.E. 99-84 (2001).<sup>1</sup>

On September 6, 2000, the Department approved the mergers of Fall River Gas and North Attleboro Gas with the Southern Union Company. Fall River Gas Company, D.T.E. 00-25 (2000) and North Attleboro Gas Company, D.T.E. 00-26 (2000). In its orders approving the mergers, the Department directed the Companies to develop and file a service-quality plan with the Department no later than 18 months after the closing of the merger, which occurred on September 28, 2000. In addition, the Department directed the Companies to formulate the service-quality plan in accordance with the generic standards set forth in Service Quality Standards, D.T.E. 99-84 (2001) (the "Guidelines"). D.T.E. 00-25, at 15; D.T.E. 00-26, at 14-15.<sup>2</sup>

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<sup>1</sup> The Companies have included redlined copies of the plans to indicate changes from the Department's generic set of guidelines.

<sup>2</sup> The mergers with Southern Union were completed on September 28, 2000, and therefore, the 18-month deadline established by the Department in the merger orders is March 28, 2002. To facilitate the Department's review, however, the Companies are submitting their plans for complying with the requirements of D.T.E. 99-84 on this date. The Companies will make their first annual service quality filing on March 1, 2002, which is consistent with both the merger requirements and the Department's guidelines.

Accordingly, the Companies submit their service quality plans pursuant to D.T.E. 00-25 and D.T.E. 00-26, modified to comply with D.T.E. 99-84.<sup>3</sup>

## **I. THE COMPANIES' SERVICE QUALITY PLANS**

The Companies' service-quality plans will apply to the three-year period beginning January 1, 2002 through December 31, 2004. Service-quality performance data will be filed by March 1, 2002, and will include data for each relevant performance measure through calendar year 2001. At that time, benchmarks will be established for those service-quality performance measures for which the Companies have at least three years of data. Thereafter, the Companies will file annually in March, when updated benchmarks and performance will be reported on a calendar-year basis.<sup>4</sup>

In D.T.E. 00-25 and D.T.E. 00-26, the Department established an 18-month compliance period for the Companies in order to allow them enough time to implement the systems necessary to measure and track service-quality data. This period was necessary because neither Company had generally measured its service-quality performance prior to the mergers. Following the consummation of the mergers, the Companies participated in the Department's generic service-quality proceeding, and as a result, began measuring their performance in accordance with the Department's identified service-quality performance categories. Accordingly, as of March 1, 2002, the Companies will have sufficient data to propose benchmarks in some, but not all, of the categories required by the Department to be measured, as noted below.

### **A. Performance Measures**

#### **1. Customer Service and Billing Performance Measures**

- Telephone Service Factor

Under the Guidelines, the Companies are required to gather data and report statistics on the percentage of telephone calls from customers that are handled within a time interval consistent with each company's response-time measuring system. Until the date of the Department's order in D.T.E. 99-84 (June 29, 2001), the Companies did not gather data for telephone response time. Pursuant to the June 29 Order, Fall River

<sup>3</sup> The enclosed service-quality plans are submitted in accordance with the Department's authority to approve the Companies' merger-related filings in D.T.E. 00-25 and D.T.E. 00-26, as modified to comply with D.T.E. 99-84. However, the Department is not authorized to impose service-related penalties on the Companies because the statutory authority to do so under G.L. c. 164, § 1E is linked to performance-based rate plans. Since the Companies are not subject to performance-based rate plans, the penalty guidelines in D.T.E. 99-84 may not be imposed by the Department in the context of the Companies' merger-related service quality plans. The Companies recognize, however, that the Department's Guidelines are designed to establish a framework for maintaining service quality throughout the electric and gas industries. Therefore, without waiving any legal arguments or rights, the Companies will voluntarily incorporate the penalty provisions contained in the Guidelines in their proposed service-quality plans.

<sup>4</sup> Accordingly, in March 2003, the Companies will evaluate their service quality performance for the year 2002 using the benchmarks established in March 2002 and update those benchmarks in categories for which more than three, but less than 10 years of data are available, in order to measure performance in those categories in future years.

began collecting this data based on the percentage of calls handled within 20 seconds. In addition, Fall River is collecting data on call handling times for emergency and non-emergency calls.

North Attleboro does not currently have an automated phone system that would be capable of tracking customer calls and measuring the Company's response times.<sup>5</sup> The New England Division of Southern Union is currently evaluating the feasibility of combining North Attleboro's call center with another larger facility where tracking and reporting would be feasible, but no final plans are in place to accomplish this consolidation. Accordingly, North Attleboro does not have the capability to report on this performance statistic. North Attleboro will update the Department on its efforts to implement a measurement system in its March 1, 2001 annual filing.

Fall River will report the data collected for this measure by March 2002, and annually thereafter. Appropriate benchmarks for this measure will be proposed once the Companies have compiled three calendar years of data for this performance measure.

- Service Appointments Met on the Same Day Requested

Prior to the Department's June 29 Order, Fall River did not gather data on the number or percentage of service appointments met by Company personnel on the same day requested. Pursuant to the June 29 Order, Fall River began to track data consistent with the Guidelines for this measure. North Attleboro has approximately one year of data regarding its service appointments met as scheduled.

The Companies will report the data collected for this measure by March 2002, and annually thereafter. Appropriate benchmarks for this measure will be proposed once the Companies have compiled three calendar years of data for this performance measure.

- On-Cycle Meter Readings

The Guidelines require the reporting of data on the percentage of meters that are actually read by a company, monthly. Fall River began to collect data regarding its meter reading performance over three years ago. Prior to the June 29 Order, North Attleboro had not measured its meter reading performance, but has since begun to track its performance in this category.

The Companies will report the data collected for this measure by March 2002, and annually thereafter. Fall River will have sufficient data to establish a benchmark for this performance measure in March 2002. North Attleboro will propose a benchmark for its performance in this category once three calendar years of data for this measure are compiled.

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<sup>5</sup> Incoming calls on the North Attleboro system are directed to a staff of five people who handle approximately 60-65 customer calls per day.

2. Customer Satisfaction Performance Measures

- Consumer Division Cases and Billing Adjustments

Under the Guidelines, the performance measures relating to customer complaints filed with the Department's Consumer Division and residential billing adjustments are based on data compiled and reported by the Department.

3. Safety And Reliability Performance Measures

- Response to Odor Calls

The Guidelines require all gas companies to submit data on the percentage of Class 1 and Class II odor calls that are responded to within one hour. Both Fall River and North Attleboro have less than three years of data for this performance measure.

The Companies will report their data collected for this measure by March 2002, and annually thereafter. In addition, the Companies will propose benchmarks for its performance in this category once three calendar years of data for this measure are compiled.

- Lost Work Time Accident Rate

The Companies will comply with the requirements of the Department's Guidelines to report on the Incidence Rate of Lost Work Time Injuries and Illness per 200,000 Employee Hours, as defined by the U.S. Department of Labor Bureau of Labor Statistics. These data have been compiled and maintained by Fall River since 1991 and by North Attleboro since 1994.

The Companies will report their data collected for this measure by March 2002, and annually thereafter. In addition, the Companies will have sufficient data to establish benchmarks for this performance measure in March 2002.

**B. Other Reporting Requirements**

The Companies will report on an annual basis, beginning in March 2002, information regarding the following performance measures:

- Restricted Work Day Rate
- Unaccounted for Gas
- Major Capital Investments in Transmission and Distribution Infrastructure<sup>6</sup>

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<sup>6</sup> The Department has directed utilities to file these reports to include data for the past ten years. The Companies have determined that 10 years' of data is not available, and therefore, has modified the language to require the filing of available data up to a period of ten years.

- Spare Component Acquisition and Inventory Policy and Practice
- The results of two consumer surveys for each Company: (1) a customer satisfaction survey of a statistically representative sample of residential customers; and (2) a survey of customers randomly selected from those customers who have contacted the Company's customer service department within the year in which service is being measured. An outside vendor will be hired to conduct the phone survey on behalf of the Companies.

**C. Staffing Levels**

In its March 2002 service quality filing, the Companies will provide available historical data regarding employee staffing levels.

**D. Customer Guarantees**

Consistent with the Department's order in D.T.E. 99-84, as of January 1, 2002, the Companies will provide customer guarantees in the amount of \$25.00 for each: (1) scheduled service appointment that the Companies fail to keep; (2) scheduled service appointment for which the Companies are more than four hours late; (3) scheduled service outage for which the Companies fail to notify an affected customer.

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,

Cheryl M. Kimball

Enclosure

cc: Chairman Connelly  
Commissioner Keating  
Commissioner Vasington  
Commissioner Sullivan  
Commissioner Manning  
Paul G. Afonso, General Counsel  
Sharon Partridge, Vice President, New England Division of Southern Union Company  
Kerry Britland, New England Division of Southern Union Company